

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING  
(PROPOSAL EIGHT)

Docket No. RM2017-12

MOTION OF THE UNITED STATES POSTAL SERVICE FOR LEAVE  
TO FILE REPLY COMMENTS REGARDING PROPOSAL EIGHT  
(September 26, 2017)

Pursuant to Commission Order No. 4025 (August 2, 2017), comments regarding Proposal Eight were to be submitted no later than September 18, 2017. That Order, however, made no explicit provision for reply comments. Having reviewed the comments filed by the Alliance of Nonprofit Mailers (ANM) on September 18<sup>th</sup>, the Postal Service submits that an opportunity for the Postal Service to respond is appropriate. Therefore, the Postal Service requests leave to file reply comments, which are being concurrently submitted as a separate pleading.

ANM has submitted a set of comments (along with supporting documentation) comprehensively addressing Proposal Eight. ANM presents a thorough background on the history of the relevant nonprofit ratemaking provisions over the years. ANM also introduces some new concepts into the discussion, such as the idea of the effective rate preference. A key component of the ANM analysis has been unduly truncated, however, with the potential effect of masking the more salient comparison. The Postal Service submits that an opportunity to identify deficiencies in the facts and the arguments that ANM has presented will enhance the Commission's ability to more fully

evaluate Proposal Eight, and to reach an appropriate resolution of the complicated issues presented.

. Therefore, the Postal Service respectfully request leave to file reply comments with respect to the initial comments filed by ANM regarding Proposal Eight.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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